

JON L. NORINSBERG

ATTORNEY AT LAW

225 BROADWAY

SUITE 2700

NEW YORK, NEW YORK 10007

www.norinsberglaw.com

Bronx Office  
1 Rivercrest Road  
Bronx, New York 10471

Tel. (212) 791-5396  
Fax (212) 406-6890  
email: jmeehan@norinsberglaw.com

Jon L. Norinsberg

John J. Meehan

November 21, 2019

**VIA ECF**

Honorable Nelson S. Román  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Pltf. granted an extension of  
time until Feb. 3, 2020 to file an  
amended complaint. Clerk of the  
Court requested to terminate the  
motion (doc. 23).

SO ORDERED:

Re: Montgomery v. Cappelli, et. al.,  
19 Civ. 1558 (NSR)

Dated: Nov. 22, 2019

Your Honor,

HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE

I represent plaintiff Isaiah Montgomery in the above referenced civil rights action brought pursuant to 42 U.S.C. §1983. I write now to respectfully request a sixty (60) day extension of time, from December 3, 2019,<sup>1</sup> to February 3, 2020, for plaintiff to file his amended complaint. Karen Edelman-Reyes, Esq., counsel for defendants, consents to this request.

The reason for the application is that this office has just recently taken over as counsel for plaintiff, and has not yet been able to obtain any of the criminal documents or medical records regarding the incident that is the subject of this lawsuit. Yesterday, my office provided Ms. Edelman-Reyes with a release that will allow the parties to obtain the sealed criminal records. Once this office is in receipt of such records, we will be in a better position to draft an amended complaint.

Based on the foregoing, plaintiff respectfully requests a sixty (60) day extension of time, from December 3, 2019, to February 3, 2020, for plaintiff to file his amended complaint.

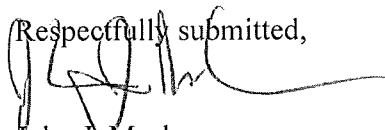
I thank the Court for consideration of this request.

<sup>1</sup> Pursuant to the Court's Order, dated October 18, 2019, plaintiff had fifteen (15) days to file an amended complaint after defendants provided plaintiff with the full names and addresses of defendants. This information was provided on November 18, 2019, and as such, the amended complaint is currently due on December 3, 2019.

MEMO ENDORSED

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED  
11/22/2019

Respectfully submitted,



John J. Meehan

cc: Karen Edelman-Reyes, Esq.  
*Counsel for Defendants.*